

Judge Pauley

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

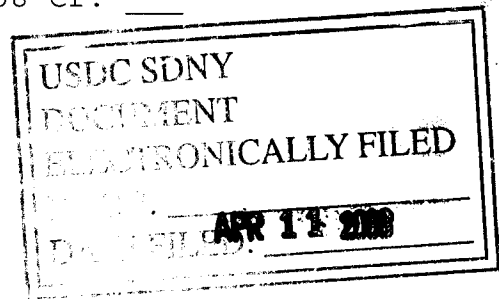
- v. -

ZHAO ZHAN WU,

Defendant.

08 CRIM 329

08 Cr. _____



COUNT ONE

The United States Attorney charges:

1. From at least in or about October 2007, up to and including on or about November 1, 2007, in the Southern District of New York and elsewhere, Zhao Zhan Wu, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that Zhao Zhan Wu, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 841(a)(1), and 841(b)(1)(A) of Title

21, United States Code.

(Title 21, United States Code, Section 846.)

COUNT TWO

The United States Attorney charges:

3. From at least in or about January 2007, up to and including on or about November 1, 2007, in the Southern District of New York and elsewhere, Zhao Zhan Wu, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

4. It was a part and an object of the conspiracy that Zhao Zhan Wu, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, 100 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Sections 812, 841(a)(1), and 841(b)(1)(B) of Title 21, United States Code.

(Title 21, United States Code, Section 846.)

COUNT THREE

The United States Attorney charges:

5. From at least in or about April 2007, up to and including on or about November 1, 2007, in the Southern District of New York and elsewhere, Zhao Zhan Wu, the defendant, and others known and unknown, unlawfully, intentionally, and

knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

6. It was a part and an object of the conspiracy that Zhac Zhan Wu, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, thousands of pills containing a detectable amount of 3,4-methylenedioxymeth amphetamine ("MDMA"), commonly known as "Ecstasy," in violation of Sections 812, 841(a)(1), and 841(b)(1)(C) of Title 21, United States Code.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

3. As a result of committing the controlled substance offenses alleged in Counts One, Two, and Three of this Information, Zhao Zhan Wu, the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One, Two, and Three of this Information.

Substitute Asset Provision

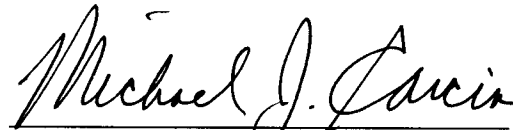
4. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the

defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

- v. -

ZHAO ZHAN WU,

Defendant.

INDICTMENT

08 Cr. ____

(Title 21 Sections 841(a)(1), 846 and 853)

Michael J. Garcia
United States Attorney.

A TRUE BILL

Foreperson.
